

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

AGIS SOFTWARE DEVELOPMENT LLC, § v. § HMD GLOBAL, et al. §	§ § § § §	Case No. 2:22-cv-00443-JRG (Lead Case)
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AGIS SOFTWARE DEVELOPMENT LLC, § v. § PANASONIC CORPORATION, et al. §	§ § § §	Case No. 2:22-cv-00447-JRG (Member Case)
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**UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO ANSWER  
OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendants, Panasonic Holdings Corporation (named in Plaintiff’s Complaint as “Panasonic Corporation”) (hereinafter “PHC”) and Panasonic Corporation of North America (hereinafter “PCNA”) (collectively “the Panasonic Defendants” or “Defendants”), without waiving any defenses set forth in Federal Rule Civil Procedure 12, file this unopposed motion for an extension of time in which to answer or otherwise respond to Plaintiff’s Complaint for Patent Infringement and respectfully show the Court:

1. The Court has ordered the Panasonic Defendants to answer or otherwise respond to Plaintiff’s Complaint by November 16, 2023. Defendants respectfully move the Court for a sixty-day extension of time through January 15, 2024 in which to answer or otherwise respond to the complaint. Good cause exists for this extension.

2. Neither of the Panasonic Defendants has been served with process in this action. PHC is a corporation organized and existing under the laws of Japan and is a member of the Hague Convention. In consideration for the additional time requested,

PHC has agreed to waive the normal legal requirement of being served pursuant to the provisions of the Hague Convention and respond to the complaint on or before January 15, 2024. PCNA has agreed to waive service in consideration for the same extension through January 15, 2024. Answering or responding to the complaint on the same date will facilitate judicial economy and efficiency.

3. Plaintiff alleges infringement of five patents. The additional time will assist the Panasonic Defendants in properly preparing their defenses herein. As set forth in the above caption, this motion is unopposed.

Wherefore, Defendants, Panasonic Holdings Corporation (named in Plaintiff's Complaint as "Panasonic Corporation") and Panasonic Corporation of North America move for an extension of time in which to answer or otherwise respond to Plaintiff's Complaint through January 15, 2024.

DATED: November 9, 2023

Respectfully submitted,

/s/ Trey Yarbrough

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**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on November 9, 2023.

/s/ Trey Yarbrough  
Trey Yarbrough

**CERTIFICATE OF CONFERENCE**

This is to certify that counsel for the Defendants and counsel for the Plaintiff conferred regarding the subject matter of this motion on October 27, 2023, and the foregoing motion is unopposed.

/s/ Trey Yarbrough  
Trey Yarbrough